



American Society for Nutrition
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January 9, 2009

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DGAC Co-Executive Secretary
USDA Center for Nutrition Policy and Promotion
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Alexandria, VA 22302

Kathryn McMurry
DGAC Co-Executive Secretary
HHS Office of Health Promotion/Disease Prevention
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Rockville, MD 20852

Dear Ms. Davis and Ms. McMurry:

The American Society for Nutrition (ASN) appreciates this opportunity to submit comments to the 2010 Dietary Guidelines Advisory Committee (DGAC). With a membership of more than 3500 scientists, ASN is the premier research society dedicated to improving the quality of life through the science of nutrition. We are proud of our members who are currently serving on the DGAC and those who have served on past Committees.

The ASN membership has a wealth of expertise in nutrition science across the spectrum—from basic, molecular biology to clinical nutrition research and practice. We welcome the opportunity to serve as a resource for the Committee as you move forward with the evaluation of the science, and we offer our assistance in identifying subject matter experts to brief the Committee on select topics when necessary. ASN has 16 Research Interest Sections dedicated to such topical areas as Aging and Chronic Disease, Dietary Bioactive Components, Nutritional Epidemiology and Vitamins and Minerals to name a few.

In May 2007, Dr. Janet King, Chair of the 2005 DGAC, and other Committee members sent a letter to Assistant Secretary for Health John Agwunobi and USDA Undersecretary for Food and Nutrition Services Nancy Johnner. ASN endorses the following recommendations set forth in this letter for the 2010 Dietary Guidelines process:

- The translation of the Dietary Guidelines Advisory Committee's report into the government Dietary Guidelines Report should be transparent. The DGAC should be informed about the translation and the content in the final report before it is released and perhaps given an opportunity to review it. This will enable the DGAC to provide better support for the final document.
- Food accessibility, marketing, economics, and culture should be considered when reviewing the science supporting the next set of Guidelines. These factors have a significant influence on food intake and health behaviors, and lack of sufficient consideration of them in previous Dietary Guidelines processes may in part explain why so few Americans follow them. A focus group of Dietary Guidelines users from such sectors as the food industry, medical and public health communities, as well as members of the general American public, could be convened to review the Guidelines before they are released and provide input on how to implement the recommendations.
- Non-evidence based approaches must supplement the systematic review that is critical to evaluating the science supporting the Guidelines and linking diet to health. Such approaches include food modeling, which is necessary for modifying the recommendations to fit the needs of subpopulations such as

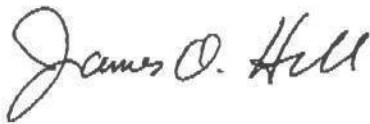
vegetarians, those with lactose intolerance, children, older adults and those from cultures whose food patterns emphasize different staples.

- The following areas should be addressed in the 2010 process: nutrient density (especially that of beverages); the health effects of different protein sources; nutritional supplements; specific functional foods or food components; and, behavioral changes to improve compliance with the Guidelines. We are pleased to see that, based on the discussion at the first meeting of the current DGAC, many of these areas have been highlighted as those on which subcommittees will concentrate.

Lastly, the recently released Physical Activity Guidelines for Americans are an important accomplishment and one that ASN applauds. However, we stand by the comments ASN submitted on Nov. 13, 2007 to the Physical Activity Guidelines Committee that state the following: "To provide a concise and consistent public health message, a unified set of guidelines that encompass both dietary and physical activity recommendations needs to be promulgated and communicated for the health and vitality of the general US population. To separate the two diffuses the message and has the potential to confuse the public. Reducing confusion is especially important, given that individuals inherently have control over dietary and physical activity behaviors."

We hope these comments are useful as the Committee moves forward with its work. Please do not hesitate to contact Mary Lee Watts, ASN's Director of Science and Public Affairs by phone at (301) 634-7112 or by email at mwatts@nutrition.org should you have any questions.

Sincerely yours,



James O. Hill, PhD
President

Attachments:

May 2007 letter to Agwunobi and Johner
List of ASN Research Interest Sections and Chairs



May 18, 2007

John O. Agwunobi
Assistant Secretary for Health

Nancy M. Johner
Assistant Secretary for Agriculture

Dear Secretaries Agwunobi and Johner:

Re: 1 May 2007 meeting regarding Dietary Guidelines

On behalf of Drs. Benjamin Caballero, Vay Liang (Bill) Go, Connie Weaver, and the other members of the 2005 Dietary Guidelines Advisory Committee (DGAC), I want to thank you for the opportunity to meet with you and your staffs to discuss the work of our Committee and plans for the 2010 Committee. The primary points made during our discussion are summarized below.

In 2005, the DGAC charge was modified. We were asked to conduct a systematic review based exclusively on the underlying science that links diet to health. This approach strengthened the rationale and documentation for the 2005 Dietary Guidelines (DGs) as well as enhanced their acceptance by both the scientific community and the public. Although our Committee was more focused and systematic than those previously, our final recommendations were dependent on the following crucial process decisions: 1) defining the questions for systemic reviews, 2) deriving conclusions when data were limited or controversial, 3) translating findings on nutrients and health into food-based guidelines, and, 4) modifying guidelines for special populations wherein data are especially limited. Such process decisions cannot be delegated. They are fundamental to careful, critical data analysis that strengthens the credibility of the DGs.

Although the 2005 process improved the outcome, opportunities for further improvement exist.

- The translation of the DGAC report into the government Dietary Guidelines Report was not transparent. We recognize that the circumstances in early 2005 were unique with a political transition in progress. Nevertheless, we recommend that the DGAC be better informed about the translation and the content of the final report before it is released in the future. This will enable the DGAC to provide better support for the final document.
- As stated above, the 2005 DGAC review was exclusively based on science. Other influences on food intake, such as food accessibility, marketing, economics, and culture were not considered. This may explain in part why only 3 to 4% of all Americans follow the DGs. We suggest that a small group of DG users (i.e., representatives from the food industry, medical, and public health communities) review the DGs *before* they are released and provide input on how to implement the recommendations.

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- While a systematic review is crucial to evaluating the science relating diet and health, non-evidence based approaches must supplement that process. For example, a food modeling approach is necessary for modifying the recommendations to fit the needs of large, diverse subpopulations that exhibit significantly variant food patterns. Examples include vegetarianism, lactose intolerance, children, the elderly, and cultures emphasizing different staple foods.
- The Physical Activity Guidelines Advisory Committee recently formed by HHS is an important accomplishment. Nevertheless, the Dietary and Physical Activity Guidelines must be integrated into one set of Guidelines should address both diet and physical activity. Until that is possible, nutritionists should serve on the Physical Activity Advisory Committee, and exercise scientists on the DGAC.
- Due to time constraints, the 2005 DGAC did not adequately address several areas. Nutrient density (especially that of beverages), the health effects of different protein sources, nutritional supplements, specific functional foods (blueberries) or food components (polyphenols), as well as behavioral changes to improve compliance with the DGs are the most critical of these areas. We recommend that they be addressed in 2010.

Serving on a DGAC is a demanding, intense process. All 2005 DGAC members were truly honored to be chosen for this work. However, the time demand was far greater than that expected by first-rate scientists who were fully engaged elsewhere. We had excellent staff support and the assistance of a superb science writer. Nevertheless, some important tasks received little attention (research needs). Potential ways to mitigate the time crunch include 1) establishing a permanent DGs core staff in HHS and USDA to maintain the scientific data base, 2) making two-term appointments for one or two DGAC members to provide continuity, and 3) creating a web-based system for accessing the research papers and drafting the document.

We wish you success in developing the 2010 Dietary Guidelines. We thoroughly enjoyed our discussions with you and sincerely appreciate your enthusiasm and dedication to developing strong Dietary Guidelines in the future. If our Committee can assist in any way, please do not hesitate to contact us.

Sincerely,



Janet C. King, Ph.D.
Chair, 2005 Dietary Guidelines Advisory Committee and
Senior Scientist and Professor

cc: Staff at CNPP and Office of Public Health and Science
2005 Dietary Guidelines Advisory Committee members

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